

U.S. DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
FILED

09 SEP -9 P2 :00

UNITED STATES OF AMERICA,

Plaintiff,

v.

WILLIE KOHLHEIM, Jr., and
PAMELA KOHLHEIM,

Defendants.

JON W. SANFILIPPO
CLERK
Case No. 09-CR-

09 CR-221

[18 U.S.C. §§ 152(3) and 152(1)]

INDICTMENT

COUNTS ONE - THREE

THE GRAND JURY CHARGES:

1. Between on or about May 28, 2004, and September 10, 2004, in the State
and Eastern District of Wisconsin,

WILLIE KOHLHEIM, JR., and
PAMELA KOHLHEIM

knowingly and fraudulently made false declarations, certifications, verifications, and
statements under penalty of perjury as permitted under Section 1746 of Title 28, in or in
relation to a case under Title 11, to wit:

Count	Bankruptcy Petition in Case No. 01-32514-SVK
1	On line 2 of Schedule B, the defendants failed to list a bank account held in the name of Willie Kohlheim, Jr. at St. Francis Bank, now National City Bank. In truth and in fact, the defendant Willie Kohlheim, Jr. and Pamela Kohlheim had authority over said account.

Count	Bankruptcy Petition in Case No. 01-32514-SVK
2	On Line 22 of Schedule B, in response to a question inquiring into licenses held by the debtor, defendant Willie Kohlheim, Jr. failed to list his state issued license as a child care provider. In truth and in fact, the defendant was issued child care provider licenses on 01/08/2003, 10/10/2003, and 05/01/2004, which expired on 10/31/2004.
3	In response to Question 18 of the Statement of Financial Affairs, the defendant answered "none" with respect to the name and nature of the business where the debtor was an officer, director, or managing executive or a corporation partnership or sole proprietorship or was a self-employed professional. In truth and in fact the defendant was a self-employed professional at ""R" Family Child Care Center."

Each in violation of Title 18, United States Code, Section 152(3).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

2. Between on or about April 21, 2004, and on or about September 10, 2004, in the State and Eastern District of Wisconsin,

WILLIE KOHLHEIM, Jr., and
PAMELA KOHLHEIM

knowingly and fraudulently concealed, from a custodian, trustee, marshal, and other officer of the court charged with control or custody of property, and, in connection with a case under Title 11, from creditors and the United States Trustee, income derived from operating a licensed child care center, "'R" Family Child Care Center."

Each in violation of Title 18, United States Code, Section 152(1).

A TRUE BILL:


FOREPERSON

Dated: 9/9/09


MICHELLE L. JACOBS
United States Attorney